

Subject: WDFW Comments Critical Habitat

From: "Rocky Beach" <BEACHRJB@DFW.WA.GOV>

Date: Mon, 14 Aug 2006 10:25:36 -0700

To: <orcahabitat.nwr@noaa.gov>

CC: "Harriet Allen" <ALLENHLA@DFW.WA.GOV>, "Steve Pozzanghera" <POZZASAP@DFW.WA.GOV>, "Gary Wiles" <wilesgjw@DFW.WA.GOV>

Please see the comments on killer whale critical habitat attached.

Rocky Beach

Wildlife Diversity Division Manager

Washington Department of Fish and Wildlife

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August 14, 2006

Chief
NMFS, Protected Resources Division
1201 NE Lloyd Blvd., Suite 1100
Portland, OR 97232-1274

Dear Chief,

Thank you for the opportunity to comment on the proposed designation of critical habitat for southern resident killer whales. Killer whales were also classified as endangered under Washington state law in 2004, thus the Washington Department of Fish and Wildlife is fully supportive of federal efforts to protect the species. One example of this support is that WDFW is currently working with NOAA Fisheries to assist in the preparation of a federal recovery plan for the southern residents.

We have reviewed the proposed critical habitat listing and believe that it is a good approximation of the areas most important to the southern residents, based on current knowledge of their movements and habitat use. However, we hope that NOAA Fisheries will give full consideration to designating additional areas of critical habitat, where appropriate, as better information becomes available in the future. This includes areas along outer coasts of Washington, Oregon, and California, as well as Hood Canal in Puget Sound. Use of the outer coast is particularly significant during the winter and spring, and it seems likely that certain portions of the coast are important to the recovery and population expansion of the southern residents. Current efforts by NOAA Fisheries staff and other individuals to determine historical use of Hood Canal may also turn up significant new information.

The proposal to designate critical habitat currently excludes shallow near shore waters less than 20 feet in depth. We believe that further clarification of this number in relation to tidal height is desirable and therefore recommend that waters less than 20 feet below mean high tide level not be included in the final designation.

Sincerely,

Richard J. (Rocky) Beach
Wildlife Diversity Division Manager